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**May 2, 2025**

**Via ECF**

Hon. Ronnie Abrams, USMJ  
United States District Court, SDNY  
500 Pearl St.  
New York, NY 10007-1312

**Re: Rugova v. Silverstone Property Group, LLC et al**  
**Case No. 23-CV-02648 (RA)(RWL)**  
**Motion for Extension of Time**

Dear Judge Abrams:

My firm represents plaintiff in the above-referenced action, and I respectfully write to request a 30-day extension of the May 12, 2025 deadline for Plaintiff to file his motion for summary judgment. This request is being made because the recent proposed changes in the NY Governor's Budget, if adopted by the legislature, would materially and significantly impact on the manual work/biweekly pay claims in this case. It is my understanding that the legislature and Governor are in discussions and although the budge is overdue, is likely to be adopted in some form in the next 30 days – by which time we would know of any changes to the subject claims.

I reached out to counsel for Defendants for his position on this request, but he has not yet provided that position. A corresponding extension of the June 12, 2025 and July 3, 2025 deadlines are also requested. No prior request for an extension of this deadline was made.

If the request is granted, the new briefing schedule will be as follows:

Opening papers Due: **June 12, 2025**

Opposing Papers Due: **July 14, 2025**

Reply Papers Due: **August 4, 2025**

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**Cc: Defense counsel via ECF**

Application granted on Defendants' consent. *See* ECF No. 62. The Court adopts the briefing schedule proposed above.

SO ORDERED.



Hon. Ronnie Abrams  
May 5, 2025